

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 24-975
)	
162 ETHEREUM (ETH) AND 32 BITCOIN)	
(BTC) MAINTAINED IN OR ON BEHALF)	
OF ACCOUNT ID ENDING IN 0564 AT)	
CRYPTOCURRENCY EXCHANGE)	
BINANCE,)	
)	
Defendant.)	

VERIFIED COMPLAINT FOR FORFEITURE

AND NOW comes the United States of America, by and through its counsel, Eric G. Olshan, United States Attorney for the Western District of Pennsylvania, and Jill L. Locnikar, Assistant United States Attorney for the Western District, and respectfully represents as follows:

1. Plaintiff, the United States of America, brings this civil action *in rem* for forfeiture to the United States of the following property, further described at asset identification numbers 22-USS-000544 and 22-USS-000545 (the “Defendant Property”), pursuant to 18 U.S.C. §§ 981(a)(1)(A) and 981 (a)(1)(C): 162 Ethereum (ETH) and 32 Bitcoin (BTC) maintained in or on behalf of Account ID ending in 0564 in the customer name of Shiv Pannar on record at Cryptocurrency Exchange Binance (the “Pannar Account”).

2. Jurisdiction is predicated upon 28 U.S.C. § 1345 and § 1355(a). Venue is proper under 28 U.S.C. § 1395 and § 1355(b).

3. On May 9, 2022, pursuant to a federal seizure warrant, the United States Secret

Service (“USSS”) seized the Defendant Property virtually via a cryptocurrency transfer from Binance. The Defendant Property remains in a virtual wallet in the custody of the United States Marshals Service.

4. USSS discovered the Defendant Property during a complex elder fraud criminal investigation (the “Investigation”). The individual identified as Pannar and others conducted a money laundering and wire fraud scheme in violation of 18 U.S.C. §§ 1956 and 1343. The Investigation revealed that Pannar and others unlawfully defrauded elderly victims by convincing them that their identities had been stolen and that they needed to liquidate and transfer their investment accounts to accounts controlled by the perpetrators.

5. On November 27, 2021, an 82-year-old man residing in southwestern Pennsylvania (Victim known as “C.S.”) filed a complaint with the FBI’s Internet Crime Complaint Center. The fraud included, in part, the perpetrators convincing C.S. to install a software program on his computer that allowed the perpetrators to remotely access and control C.S.’s computer.

6. Upon request by the perpetrators, C.S. also opened a Gmail account and photocopied his driver’s license. These actions allowed the perpetrators to open an account in C.S.’s name and then transfer the funds to other accounts and cryptocurrency, a scheme that made the fraud less easily detectable.

7. Over the next five weeks, the perpetrators systematically had C.S. liquidate his retirement accounts. The fraud against C.S. continued for more than a month because the perpetrators instructed him not to talk to anyone about the situation under the guise that it was unsafe because someone had already stolen his identity and could further harm him.

8. Eventually, when the funds were not returned to C.S.’s original accounts as

promised, he became suspicious and told family members. The total amount stolen from C.S. was approximately \$1,288,073.00, which represented most of his life savings. By completing a thorough forensic tracing of the wired transfers from C.S.'s various accounts, the USSS was able to validate that six of seven wire transfers were converted to Tether USDT¹, and approximately 1,050,956 Tether USDT was traced to the seized Pannar account. The seventh wire transfer in the amount of \$63,000.00 went to a Bank of America corporate business account opened by a resident of Tennessee.

9. In 2022, Binance provided records for the Pannar Account. A review of these records identified incoming Bitcoin transactions from July 2021 to August 2021, which predated C.S.'s transactions in December 2021.

10. A review of these transactions identified a complaint filed by another victim (Victim known as "J.V.", and together with C.S., the "Victims").² Between the months of July and August 2021, J.V. sent approximately five wire transfers to Swan Bank in the amount of \$648,197.00 USD, which was converted to 16.2914 Bitcoin and transferred to the Pannar Account. The funds were then converted to 874,110 USDT by a user of the Pannar Account.

11. During October 2021, approximately 319,971 of the converted J.V. funds were withdrawn from the Pannar Account. The remaining amount of J.V.'s funds, which is approximately 554,139 USDT, was comingled with C.S.'s USDT, to equal approximately 1,605,095 USDT. These funds were converted to Bitcoin and Ethereum within the Pannar Account and represent approximately 29 of the 32 Bitcoin, and 158 of the 162 Ethereum seized.

¹ USDT is known as Tether, a stablecoin cryptocurrency, which is pegged to the U.S. dollar ("USD"). One USDT stablecoin is worth one USD.

² The U.S. Attorney's Office and seizing agencies will assist the Victims in filing petitions for remission for their losses.

12. The USSS seized the funds in the Pannar Account on May 9, 2022.

13. The Defendant Property represents proceeds generated from money laundering and wire fraud in violation of 18 U.S.C. §§ 1956 and 1343.

14. By reason of the foregoing, and under the provisions of 18 U.S.C. §§ 981(a)(1)(A) and 981(a)(1)(C), the Defendant Property is forfeitable to the United States.

WHEREFORE, the United States of America respectfully requests that this Honorable Court enter Judgment of Forfeiture in favor of the United States for the Defendant Property; and grant such relief to the United States as this Honorable Court may deem just and proper, together with the costs and disbursements of this Action.

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VERIFICATION

I am a Special Agent of the United States Secret Service, Department of Homeland Security, and the case agent assigned to this case.

I have read the contents of the foregoing complaint for forfeiture and the statements contained therein are true and correct to the best of my knowledge and belief.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on this 5th day of July, 2024.

/s/ Chase Clowser

CHASE CLOWSER, SPECIAL AGENT
United States Secret Service